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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In Re: §
§
HOACTZIN PARTNERS, L.P., § Case No. 19-33545-sgj7
§
Debtor. §
§

**TRUSTEE'S MOTION FOR ENTRY
OF STIPULATION AND AGREED ORDER**

Anne Elizabeth Burns (the “Trustee”), Chapter 7 Trustee in the above-captioned case, files this *Motion for Entry of Stipulation and Agreed Order*. In support, the Trustee respectfully shows the Court as follows:

1. The Court has jurisdiction over this case and this Motion under 28 U.S.C. §§ 157 and 1334. This Motion concerns the administration of the estate and is therefore a core proceeding under 28 U.S.C. § 157(b)(2)(A). Venue is proper under 28 U.S.C. § 1409.
2. By this Motion, the Trustee is seeking this Court's approval of the Stipulation and Agreed Order attached hereto as **Exhibit A** (the “Stipulation”).¹

¹ The attached version of the Stipulation has not been executed by the parties, and the parties are still working to get the Stipulation in final form. The Trustee intends to file a final, signed version of the Stipulation prior to the hearing on this Motion.

3. The Stipulation has been negotiated by and between the following parties (collectively, the “Parties”):

- a. The Trustee;
- b. Lexon Insurance Company;
- c. Peter Salas;
- d. Fieldwood Energy, LLC;
- e. Omimex Petroleum, Inc.;
- f. Continental Land & Fur Co., Inc.;
- g. Ridgewood Energy Corporation;
- h. McMoRan Oil & Gas LLC;
- i. White Oak Resources VI, LLC; and
- j. Exxon Mobil Corporation.

4. The Stipulation provides the necessary funding for the Trustee to oversee the required plugging, abandonment, and decommissioning of all leases, platforms, and pipelines for which Hoactzin is responsible under applicable law. This has been the Trustee’s goal since her appointment, and the only viable alternative to dismissal of this case.

5. Contemporaneously with this Motion, the Trustee files her *Motion for Authority to Execute Contract for Decommissioning with Chet Morrison Contractors, LLC* seeking authority to enter into a contract with Chet Morrison Contractors (“Morrison”) for Morrison to perform all decommissioning work per the proposed contract. Payment to Morrison per the Morrison contract will be funded by the Parties and allocated pursuant to the Stipulation.

6. The Stipulation also provides necessary funding for administrative costs and maintaining insurance on estate property.

7. The Stipulation is the product of several months of arms’ length negotiations among the Parties, which culminated in a mediation held on July 16, as ordered by this Court.

8. The Trustee has been granted authority to operate the business of the Debtor under section 721 of the Code (Docket No. 199). To that end, the Trustee, in her business

judgment, believes that the Stipulation is in the best interest of this estate and is consistent with the orderly liquidation of this estate.

WHEREFORE, the Trustee respectfully requests the Court enter the attached Stipulation and Agreed Order and grant the Trustee such other and further relief to which she may be justly entitled.

Respectfully submitted,

/s/ Emily S. Wall
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